

Susan L. Oliver (SBN# 160902)
WHITE, OLIVER & AMUNDSON
A Professional Corporation
550 West C Street, Suite 950
San Diego, California 92101
Telephone: (619) 239-0300
Facsimile: (619) 239-0344

Attorneys for Defendant Ira Grossman

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JOHN ESPINOZA, an individual,

Plaintiff,

v.

CITY OF IMPERIAL, a public entity; MIGUEL
COLON, an individual; IRA GROSSMAN, an
individual; and DOES 1-50, inclusive,

Defendants.

CASE NO. 07 CV 2218 LAB (RBB)

**DEFENDANT IRA GROSSMAN'S
NOTICE OF MOTION AND MOTION
TO STRIKE PLAINTIFF'S COMPLAINT
PURSUANT TO CALIFORNIA ANTI-
SLAPP STATUTE**

Date: June 2, 2008
Time: 11:15 a.m.
Judge: Hon. Larry A. Burns
Ctrm: 9

[ORAL ARGUMENT REQUESTED]

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 2, 2008, at 11:15 a.m., before the Honorable Larry A. Burns, Courtroom 9, United States District Courthouse, 940 Front Street, San Diego, California, Defendant Ira Grossman will and hereby does move to strike the Complaint filed by Plaintiff John Espinoza, pursuant to the California Anti-SLAPP Statute.

This Motion is based upon Section 425.16 of the California Code of Civil Procedure, and is brought on the grounds that:

1. Ira Grossman's Free Speech rights are implicated by Plaintiff's Complaint; and
2. Plaintiff cannot establish that there is a reasonable probability that he will prevail on his claims against Ira Grossman.

1 This Motion is also based on the Memorandum of Points and Authorities and the Declaration
2 of Susan L. Oliver filed concurrently herewith, the Request for Judicial Notice filed herewith, the
3 pleadings and records on file herein and on any additional evidence, argument or authorities that may
4 be presented at the hearing on this Motion.

5
6 Dated: April 7, 2008

WHITE, OLIVER & AMUNDSON

7
8 By: s:/Susan L. Oliver

Susan L. Oliver

9 Attorneys for Defendant Ira Grossman
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28